

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber should be sealed.

On December 12, 2025, Plaintiff filed a Motion to Preclude Uber from Cherry-Picking Corporate Trial Witnesses and Calling at Trial Late Disclosed Witnesses that refers to and attaches documents that Uber designated "HIGHLY CONFIDENTIAL" and / or "CONFIDENTIAL."

Material To Be Filed Under Seal

The material to be filed under seal is portions of Plaintiff's Opposition and the attached exhibits.

Document	Description	Designating Party
[Unredacted] Plaintiff's Motion	Portion of briefing referring to documents designated highly confidential and confidential	Uber
Exhibit C	December 4, 2025, Declaration of Todd Gaddis	Uber
Exhibit D	October 24, 2025, Rebuttal Expert Report of Vida Thomas	Uber

Document	Description	Designating Party
Exhibit H	Excerpts of Document bates stamped UBER-MDL3084-BW-00006299	Uber

Under Local Rule 79-5(f)(3), the designating entities bear the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Andrew R. Kaufman in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: December 12, 2025

Respectfully submitted,

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FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: December 12, 2025

By: /s/ Andrew R. Kaufman
Andrew R. Kaufman